



THE PACIFIC FOREST TRUST

Working Forests Work Wonders For Us All.

January 30, 2009

Cynthia Bryant, Director, Office of Planning and Research
Terry Roberts, State Clearinghouse Director, Office of Planning and Research
P.O. Box 3044
Sacramento, CA 95812-3044

Re: Comments on the Governor's Office of Planning and Research (OPR) Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions

Submitted via email to CEQA.GHG@opr.ca.gov

Dear Ms. Bryant and Ms. Roberts:

The Pacific Forest Trust¹ greatly appreciates the opportunity to provide comments on OPR's draft CEQA amendments. In particular, PFT strongly supports the explicit inclusion of forest resources in section II of the Appendix G environmental checklist. Our forests provide a host of critical environmental values, from clean water and wildlife habitat to biodiversity and sustainable forest products. A key value for OPR's update of the CEQA guidelines is the role of forests in climate change. Forests release significant amounts of carbon dioxide (CO₂) when converted to non-forest use, and, alternatively, can absorb and store CO₂ for long periods of time when restored, protected, and sustainably managed. The addition of environmental impacts to forestland, including forest loss, conversion to non-forest use, and zoning changes, is a crucial step forward for appropriately assessing the climate value of forestland and ensuring adequate mitigation. It is also consistent with the California Air Resources Board Scoping Plan for AB 32, which recognizes the significant effect of forest conversion on climate, and identifies CEQA as a main mechanism for assessing and mitigating impacts.²

In addition, PFT supports and appreciates the changes to Appendix G section XVI on transportation/traffic, which now consider the impact on vehicle miles traveled (VMT), one of the largest and increasing sources of greenhouse gas (GHG) emissions. Reducing VMT is vital for reducing GHGs and shifting to transportation and infrastructure that support a low-carbon economy. Further, development that lowers VMT often has the extra benefit of reducing conversion of natural and working lands, thereby maintaining their climate value. While this section represents significant progress, PFT also supports the specific recommendations to further improve the language proposed by ClimatePlan.

To help ensure full assessment and appropriate mitigation of project GHG impacts, PFT would also like to make the following recommendations, discussed in detail below:

- 1. Add language specific to land conversion as a source of GHGs and lost sequestration in Section 15064.4.**
- 2. Revise Section 15126.4(c) to reflect clear mitigation priorities and rigorous GHG accounting standards for any offsets.**

¹ PFT is a non-profit organization dedicated to sustaining private forests for all their public benefits, including climate benefits. We own and manage forestland, as well as hold and steward conservation easements on private forestland throughout California and the Pacific Northwest. In collaboration with landowners, forest managers, public agencies and others, PFT has helped lead the development of forest climate policies and projects to achieve substantial benefits for the climate through conservation and stewardship.

² CARB Climate Change Proposed Scoping Plan Appendices, Volume I, page C-166.

1. Add language specific to land conversion as a source of GHGs and lost sequestration in Section 15064.4.

This section, *Determining the Significance of Impacts from Greenhouse Gas Emissions*, is incredibly important for assisting lead agencies in assessing the full scope of project impacts on climate change. As such, PFT suggests OPR add a provision that is the logical first step in any GHG assessment: the direct changes to the land resulting from development of the project. The text could read:³

(a)(2) The extent to which the project may result in the conversion of land that contributes to greenhouse gas emissions from the loss of carbon stocks and/or loss of future sequestration capacity.

Methodologies for assessing GHG impacts from land conversion are already available for some land types,⁴ forests in particular, and are in the process of being developed for additional land types. Where no methodology exists and is not under development, this change would encourage development of new GHG assessment methods. This language would also complement the addition of forest resources in Appendix G, making the link between forests and climate unavoidably clear. Lead agencies would retain the discretion to determine the circumstances under which a detailed assessment of carbon stock loss and future sequestration capacity is warranted.

2. Revise Section 15126.4(c) to reflect clear mitigation priorities and rigorous GHG accounting standards for any offsets.

PFT strongly encourages OPR to include some prioritization in its discussion of mitigation measures related to GHG emissions. Specifically, we would recommend making it clear that projects should first take all actions possible to reduce the expected impacts from the project itself; examples of such actions include minimizing the footprint of development projects and placing a conservation easement on remaining undeveloped land. In some circumstances, however, off-site measures can be appropriate and valuable.

Due to the multiple ecosystem services of forests, including climate benefits but also wildlife habitat, biodiversity, adaptation value, and water provision, among others, off-site mitigation measures for impacts to forest resources should be targeted within the forest sector. This approach is consistent with the AB 32 Scoping Plan target of “no net loss” of forest climate benefits as well as the general CEQA requirement for a nexus between impacts and mitigation measures.⁵

We appreciate the inclusion of carbon sequestration as a potential mitigation measure. To the degree offsets are utilized for CEQA mitigation, however, we urge OPR to incorporate standard domestic and international language addressing the required quality of those

³ The numbering shows (a)(2) because we believe it makes sense to list potential GHG impacts from land conversion towards the top, recognizing that identifying impacts to the land is a starting point for an environmental assessment.

⁴ See, e.g., Forest Protocols adopted by California Air Resources Board October 2007; see also (1) U.S. Environmental Protection Agency. 2005. Greenhouse Gas Mitigation Potential in U.S. Forestry and Agriculture. EPA 430-R-05-006. Washington, D.C.; (2) Congressional Budget Office. 2007. The Potential for Carbon Sequestration in the United States; (3) U.S. Climate Change Science Program. 2007. The First State of the Carbon Cycle Report: The North American Carbon Budget and Implications for the Global Carbon Cycle. Synthesis and Assessment Product 2.2.; (4) IPCC Good Practice Guidance for LULUCF, 2003; (5) 2006 IPCC Guidelines for National Greenhouse Gas Inventories.

⁵ CARB Climate Change Proposed Scoping Plan Appendices, Volume I, page C-166; see also CEQA Guidelines Section 15126.4(4).

offsets. Under AB 32, and as commonly stated in a number of GHG programs and protocols,⁶ all emission reductions must be real, additional, quantifiable, verifiable, permanent, and enforceable. The text could read:

(c)(5) Where mitigation measures are proposed for reduction of greenhouse gas emissions through off-site measures or purchase of carbon offsets *that are real, additional, quantifiable, verifiable, permanent, and enforceable, ...*

Thank you very much for your consideration of our comments and recommendations. We look forward to working with you as the guidelines are finalized for submittal to the California Resources Agency, and of course please do not hesitate to contact us with any questions or concerns.

Sincerely,

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⁶ See, for example, the Regional Greenhouse Gas Initiative (RGGI), California Climate Action Registry Project Protocols, Voluntary Carbon Standard (VCS), Clean Development Mechanism under the Kyoto Protocol, among others.